

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 7, 2018

Jimmie Cho, Senior Vice President
Customer Service & Distribution Operations
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

GI-2018-04-SCG-61

**Subject: General Order (G.O.) 112-F Comprehensive Operation and Maintenance
Inspection of Southern California Gas Company's Desert Valley Distribution Region**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Desert Valley Distribution Region (Inspection Unit) on April 02 – 13, 2018 for calendar years 2015 thru 2017. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED conducted field inspections of pipeline facilities in the Palm Desert, El Centro and Yucca Valley Distribution districts within the Inspection Unit. SED's staff also reviewed the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified one probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted one area of concern and these are described in the attached "Summary of Inspection Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG to address the probable violations and the concern noted in the "Summary of Inspection Findings".

If you have any questions, please contact Durga Shrestha, at (213) 576-5763, or by email: DS3@cpuc.ca.gov

A handwritten signature in blue ink, reading "Kenneth A. Bruno", is positioned above the typed name.

Sincerely,

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Durga Shrestha, SED/GSRB; Kan Wai Tong, SED/GSRB; Kelly Dolcini, SED/GSRB
Troy Bauer, Sempa

Summary of Inspection Findings
2018 SCG's Desert Valley Distribution Inspection
April 02 - 13, 2018

I. SED Identified Probable Violations

Title 49 CFR, Part 192, Section 192.13 What general requirements apply to pipelines regulated under this part?

“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”

During the field inspection of SCG's leak detection survey program, SED staff noted a discrepancy on SCG's gas facilities records on the survey Map PWE-109 at 9878 Sundown Trail, Morongo Valley, CA. According to SCG's service history record ID #21561792, its customer (MSA #12051487) receives natural gas supply from SCG's HP supply line 41-54. However, a SCG's employee showed SED staff a GIS map on his MDT that showed the aforementioned MSA received natural gas from its Transmission Line 6916. The SCG's Inspection Unit confirmed that the GIS map was outdated. SED noted that the operator's GIS Map was not modified as accordingly. Therefore, SCG is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Sections 192.13(c).

II. Concerns, Observations and Recommendation

Title 49 CFR, Part 192, Section 192.463 (a) External corrosion control: Cathodic protection.

“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in [Appendix D](#) of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”

During the field inspections of CP facilities, SED observed that the pipe-to-soil reads at the following locations as shown in the table were out of tolerance (low P/S reads) from its -0.850 volts criteria:

Area	Point	District	Read, V
RAM REC 1	G	Palm Desert	-0.394
RAM REC 1	D	Palm Desert	-0.424
IND WEL REC 3	E	Palm Desert	-0.786
IND WEL REC 3	H	Palm Desert	-0.796
BRA REC 10	L	El Centro	-0.803
BRA REC 10	M	El Centro	-0.686
BRA REC 10	J	El Centro	-0.613
BRA REC 10	K1	El Centro	-0.676
BRA REC 10	O	El Centro	-0.701

Also, the following 10% test points were out of tolerance from the -0.85 volts criterion:

CP10 ID	District	Read, V
71384	Palm Desert	-0.603
71499	Palm Desert	-0.364
6658309	EL Centro	-0.842
6658314	El Centro	-0.829

SED recommends that SCG take prompt remedial actions to correct these corrosion control deficiencies.